

*Electronically Filed on
April 4, 2007*

JANET L. CHUBB, ESQ.
Nevada Bar # 176
LOUIS M. BUBALA, ESQ.
Nevada Bar #8974
JONES VARGAS
100 W. Liberty St, 12th Floor
P.O. Box 281
Reno, NV 89504-0281
Telephone: (775) 786-5000
Fax: 775-786-1177
Email: jlc@jonesvargas.com
tbw@jonesvargas.com
lbubala@jonesvargas.com

Attorneys for
ENRICO MORELLI and PAUL MORELLI

UNITED STATE BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

CHARLOTTE E. MORELLI,

Debtor.

Case No. BK-N-06-50272-GWZ
Chapter 7 (Converted from 13)

ENRICO MORELLI and PAUL MORELLI,

Plaintiffs,

Adversary No. 06-5099

vs.

**NOTICE OF ATTORNEYS' LIEN OF
JONES VARGAS**

CHARLOTTE MORELLI, individually and as
trustee of the Pia Family Trust, Pia Family
Trust A, Pia Family Trust B, Pia Family Trust
dated November 16, 1995, JA Trust, CM Trust,
Becaris Trust, Bay Cities Properties Trust, and
Coffee Plaza Trust; PIA FAMILY TRUST; PIA
FAMILY TRUST A; PIA FAMILY TRUST B;
PIA FAMILY TRUST DATED NOVEMBER
16, 1995; JA TRUST; CM TRUST; BECARIS
TRUST; BAY CITIES PROPERTIES TRUST;
COFFEE PLAZA TRUST; BAY CITIES
PROPERTIES, INC.; and COFFEE PLAZA,

Defendants.

Hearing Date: n/a
Hearing Time: n/a

PLEASE TAKE NOTICE that Jones Vargas, by and through Janet L. Chubb and Louis M.
Bubala III, claims an attorneys' lien in the amount of \$93,538.63, plus any and all accruing fees

JONES VARGAS
100 W. Liberty Street, 12th Floor
P.O. Box 281
Reno, Nevada 89504-0281
Tel: (775) 786-5000 Fax: (775) 786-1177

1 and costs from March 31, 2007, forward against any claim, demand or cause of action, in favor of
2 Enrico Morelli and/or Paul Morelli, and to any money or property which is recovered in this
3 action. NRS 18.015. This lien attaches to any verdict, judgment or decree entered and to any
4 money or property which is recovered on account of the suit or other action, from the time of
5 service of the notices required by NRS 18.015.

6 DATED this 4th day of April, 2007.

7 JONES VARGAS

8
9 By: //s// LOUIS M. BUBALA III
10 JANET L. CHUBB
11 LOUIS M. BUBALA III
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

JONES VARGAS
100 W. Liberty Street, 12th Floor
P.O. Box 281
Reno, Nevada 89504-0281
Tel: (775) 786-5000 Fax: (775) 786-1177

JONES VARGAS
100 W. Liberty Street, 12th Floor
P.O. Box 281
Reno, Nevada 89504-0281
Tel: (775) 786-5000 Fax: (775) 786-1177

CERTIFICATE OF SERVICE

1. On April 4, 2007, I served the following document(s):

NOTICE OF ATTORNEYS' LIEN OF JONES VARGAS

2. I served the above-named document(s) by the following means to the persons as listed below:

■ a. **ECF System** (attach the "Notice of Electronic Filing" or list all persons and addresses):

- JEREMY T BERGSTROM mbergstrom@mileslegal.com
- DANIEL S CORDER idontlikemondays@msn.com
- FRED E. GREEN FRED.E.GREEN@IRSCOUNSEL.TREAS.GOV
- RICHARD G. HILL greccelle@richardhillaw.com, cdetlie@richardhillaw.com
- MICHAEL LEHNERS mikelehners@yahoo.com
- ANABELLE SAVAGE angiesavage@sbcglobal.net, nv06@ecfcbis.com
- U.S. TRUSTEE - RN - 7 USTPRegion17.RE.ECF@usdoj.gov
- JOAN C WRIGHT jwright@allisonmackenzie.com, jbrooks@allisonmackenzie.com

■ b. **United States certified mail, postage fully prepaid - return receipt requested** (list persons and addresses):

ENRICO MORELLI
4116 MAYFIELD DRIVE
MODESTO, CA 95356

PAUL MORELLI
4116 MAYFIELD DRIVE
MODESTO, CA 95356

CHARLOTTE E. MORELLI
POB 6372
GARDNERVILLE, NV 89460

● c. **Personal Service** (list persons and addresses):

I personally delivered the document(s) to the persons at these addresses:

☐ For a party represented by an attorney, delivery was made by handing the document(s) to the attorney or by leaving the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

● d. **By direct email (as opposed to through the ECF System)** (list persons and email addresses):

JONES VARGAS
100 W. Liberty Street, 12th Floor
P.O. Box 281
Reno, Nevada 89504-0281
Tel: (775) 786-5000 Fax: (775) 786-1177

Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

9 e. By fax transmission (list persons and fax numbers):

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

BART BARRINGER, ESQ.
1324 J St.
P.O. Box 95353
Modesto, CA 95353
Fax: 209-544-9875

DEBORAH A. PALMER, ESQ.
218 Elks Point Rd., Ste. 305
P.O. Box 11250
Zephyr Cove, NV 89448
Fax: (775) 588-8223

9 f. By messenger:

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed blow and providing them to a messenger for service. (A declaration by the messenger must be attached to this Certificate of Service).

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 4th day of April, 2007.

J. Englehart
Name

//s// J. Englehart
Signature